

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

SEP 09 2014
MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THOMAS R. RODELLA,

Defendant.

CRIMINAL NO. 14-CR-2783 JB

Count 1: 18 U.S.C. § 242: Deprivation
of Rights;

Count 2: 18 U.S.C. § 924(c)(1)(A)(ii):
Brandishing a Firearm.

SUPERSEDING INDICTMENT

Count 1

On or about March 11, 2014, in Rio Arriba County in the District of New Mexico, the defendant, **THOMAS R. RODELLA**, while acting under color of law, willfully deprived M.T. of the right, protected and secured by the Constitution and laws of the United States, not to be subjected to unreasonable seizure by a law enforcement officer. Specifically, the defendant pursued M.T., assaulted M.T., used unreasonable force and caused M.T.'s unlawful arrest by deputies of the Rio Arriba County Sheriff's Office. This offense resulted in bodily injury to M.T. and included the use and threatened use of a dangerous weapon.

All in violation of 18 U.S.C. § 242.

Count 2

On or about March 11, 2014, in Rio Arriba County in the District of New Mexico, the defendant, **THOMAS R. RODELLA**, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, deprivation of civil rights under color of law, as charged in Count 1 of this indictment, knowingly carried and brandished a firearm, and in furtherance of such crime, possessed and brandished said firearm.

All in violation of 18 U.S.C. § 924(c)(1)(A)(ii).

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

9/9/2014 10:07 AM